IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

SEALED

v.

Case No.

24 CR 210 JFH

REBECCA LEANN HUGHES and NATHANIAL LOUIS HUGHES,

Defendants.

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

CONSPIRACY TO ACQUIRE A FIREARM FROM A LICENSED DEALER BY FALSE AND FICTITIOUS STATEMENT [18 U.S.C. §§ 371 & 922(a)(6)]

Beginning on or about June 26, 2024, and continuing until on or about July 21, 2024, in the Eastern District of Oklahoma, the defendants, **REBECCA LEANN HUGHES** and **NATHANIAL LOUIS HUGHES**, did knowingly and intentionally conspire, confederate and agree to commit offenses against the United States in violation of Title 18, United States Code, Section 922(a)(6), namely, acquire a firearm from a licensed dealer by false and fictitious statement in violation of federal firearm laws and in furtherance of said conspiracy the defendants committed the following Overt Acts:

 On or about June 26, 2024, REBECCA LEANN HUGHES, entered the EZ Pawn store in Durant, Oklahoma, and purchased two firearms: a Taurus PT609, 9mm pistol, bearing serial number TGW75675; and a Canik Model TP-9SA, 9mm pistol bearing serial number T6472-23AP00591.

- 2. On or about June 26, 2024, **REBECCA LEANN HUGHES**, filled out an ATF Form 4473 and answered "YES" on Block 21(a), indicating she was the actual buyer of the two firearms listed on the form.
- Between on or about June 26, 2024, and on or about August 26, 2024, REBECCA LEANN
 HUGHES gave NATHANIAL LOUIS HUGHES the two firearms she purchased on
 June 26, 2024, to sell.
- Between on or about June 26, 2024, and on or about August 26, 2024, NATHANIAL LOUIS HUGHES sold the two firearms REBECCA LEANN HUGHES purchased on June 26, 2024.
- On or about July 21, 2024, NATHANIAL LOUIS HUGHES, talked to an employee of the EZ Pawn store in Durant, Oklahoma, and planned to have REBECCA LEANN HUGHES purchase firearms at a discount.
- 6. On or about July 21, 2024, at approximately 3:15 p.m., **REBECCA LEANN HUGHES** and **NATHANIAL LOUIS HUGHES** entered the EZ Pawn store together.
- 7. On or about July 21, 2024, NATHANIAL LOUIS HUGHES selected firearms for REBECCA LEANN HUGHES to buy for him at the EZ Pawn store.
- On or about July 21, 2024, REBECCA LEANN HUGHES purchased a total of twelve firearms and signed two ATF Form 4473s, indicating she was the actual buyer of the firearms.
- 9. On or about July 21, 2024, NATHANIAL LOUIS HUGHES, carried several firearms that REBECCA LEANN HUGHES purchased out of the EZ Pawn store.
- 10. On or about July 21, 2024, REBECCA LEANN HUGHES and NATHANIAL LOUIS

HUGHES placed eleven firearms in their vehicle and left the EZ Pawn store parking lot.

11. Between on or about June 26, 2024, and on or about August 26, 2024, NATHANIAL LOUIS HUGHES sold twelve firearms that REBECCA LEANN HUGHES purchased for him on June 26, 2024, and July 21, 2024.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

FALSE STATEMENT DURING PURCHASE OF A FIREARM [18 U.S.C. §§ 922 (a)(6) & 924(a)(2)]

On or about June 26, 2024, within the Eastern District of Oklahoma, the defendant, **REBECCA LEANN HUGHES**, in connection with the acquisition of a firearm, to wit:

- one (1) Taurus PT609, 9mm pistol bearing serial number TGW75675; and
- one (1) Canik Model TP-9SA, 9mm pistol bearing serial number T6472-23AP00591; from a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that she was the actual buyer of the firearm when in truth and fact she was not, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

FALSE STATEMENT DURING PURCHASE OF A FIREARM [18 U.S.C. §§ 922 (a)(6) & 924(a)(2)]

On or about July 21, 2024, within the Eastern District of Oklahoma, the defendant, **REBECCA LEANN HUGHES**, in connection with the acquisition of a firearm, to wit:

• one (1) Charter Arms Bulldog, .44 caliber revolver bearing serial number 272175;

• one (1) Taurus Model 2208-65, .357 mag revolver bearing serial number BM573305; from a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that she was the actual buyer of the firearm when in truth and fact she was not, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

FALSE STATEMENT DURING PURCHASE OF A FIREARM [18 U.S.C. §§ 922 (a)(6) & 924(a)(2)]

On or about July 21, 2024, within the Eastern District of Oklahoma, the defendant, **REBECCA LEANN HUGHES**, in connection with the acquisition of a firearm,

- one (1) Palmetto State Armory, PA15, 8.5 rifle bearing serial number SCD419303;
- one (1) Yildiz Silah, Model NBD TS 870, 12-gauge shotgun bearing serial number 085426;
- one (1) Mossberg, Model 600AT, 12-gauge shotgun bearing serial number G899664;
- one (1) SIG Sauer, P238, .380 acp pistol bearing serial number 27A197005;
- one (1) Beretta M9, 9mm pistol bearing serial number M9-242135;
- one (1) Beretta 92FS, 9mm pistol bearing serial number J17078Z;
- one (1) Ruger GP100, .357 mag revolver bearing serial number 178-60502;
- one (1) Ruger Redhawk, .44 mag revolver bearing serial number 500-68751;
- one (1) SIG Sauer P320, .40 caliber pistol bearing serial number 58A026487;
- one (1) Springfield Armory XD Elite 9mm pistol bearing serial number BY175736;

from a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to the licensed dealer, which statement was intended and likely to deceive the dealer, as to a fact material to the lawfulness of such sale of said firearm to the defendant under chapter 44 of Title 18, in that the defendant represented that she was the actual buyer of the firearm when she was not, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE

FELON IN POSSESSION OF FIREARM [18 U.S.C. §§ 922(g)(1) & 924(a)(8)]

On or about July 21, 2024, in the Eastern District of Oklahoma, the defendant, **NATHANIAL LOUIS HUGHES**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting commerce, a firearm, to wit:

- one (1) Palmetto State Armory, PA15, 8.5 rifle bearing serial number SCD419303;
- one (1) Yildiz Silah, Model NBD TS 870, 12-gauge shotgun bearing serial number 085426;
- one (1) Mossberg, Model 600AT, 12-gauge shotgun bearing serial number G899664;
- one (1) SIG Sauer, P238, .380 acp pistol bearing serial number 27A197005;
- one (1) Beretta M9, 9mm pistol bearing serial number M9-242135;
- one (1) Beretta 92FS, 9mm pistol bearing serial number J17078Z;
- one (1) Ruger GP100, .357 mag revolver bearing serial number 178-60502;
- one (1) Ruger Redhawk, .44 mag revolver bearing serial number 500-68751;
- one (1) SIG Sauer P320, .40 caliber pistol bearing serial number 58A026487;

- one (1) Springfield Armory XD Elite 9mm pistol bearing serial number BY175736;
- one (1) Charter Arms Bulldog, .44 caliber revolver bearing serial number 272175; and
- one (1) Taurus Model 2208-65, .357 mag revolver bearing serial number BM573305; which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

<u>FORFEITURE ALLEGATION</u> [18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One through Five of this Indictment involving violations of Title 18, United States Code, Sections 371, 922(g)(6), 922(g)(1), 924(a)(2), and 924(a)(8), the defendants, **REBECCA LEANN HUGHES** and **NATHANIAL LOUIS HUGHES**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including, but not limited to:

- one (1) SIG Sauer P320, .40 caliber pistol bearing serial number 58A026487; and
- one (1) Charter Arms Bulldog, .44 caliber revolver bearing serial number 272175.

A TRUE BILL:

Pursuant to the E-Government Act, the original indictment has been filed under seal in the Clerk's Office. CHRISTOPHER J. WILSON

United States Attorney

MICHAEL E. ROBINSON, MA BAR #693574

Assistant United States Attorney